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White Pine County Board of County Commissioners

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May 24, 2004

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Ms. Robin Sweeney
EIS Document Manager
Office of Transportation
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1551 Hillshire Drive, M/S 011
Las Vegas, Nevada 89134

RE: Scoping Comments on the Environmental Impact Statement for the Alignment,
Construction, and Operation of a Rail Line to a Geologic Repository at Yucca
Mountain, Nye County, Nevada

Dear Ms. Sweeney:

On behalf of the Board of White Pine County Commissioners I am pleased to provide the following comments to the scope of the environmental impact statement (EIS) for the alignment, construction, and operation of a rail line to a geologic repository at Yucca Mountain. DOE's decision to identify rail as a preferred transportation mode and to select the Caliente rail corridor for detailed engineering and environmental is viewed by White Pine County as a needed and timely step to determining the feasibility of direct rail access to Yucca Mountain. In the event that direct rail is determined to be infeasible, we understand that DOE may elect to utilize a rail to truck inter-modal facility and/or a mostly legal weight truck alternative. White Pine County encourages DOE to prepare an EIS which provides an adequate level of analysis over a range of alternatives sufficient to enable the Department to support decisions regarding 1) whether or not to construct and operate a direct rail access to Yucca Mountain, 2) which alignment, if any, to utilize within the Caliente Rail Corridor, 3) whether or not to construct and operate one or more rail to truck inter-modal facilities, 4) at what location(s) inter-modal would be developed and operated, and 5) the number of shipments and routing for any legal weight truck shipments through Nevada to the Yucca Mountain site. Where impacts to existing private and public landowners/users and public facilities are identified yet can not be avoided, White Pine County believes that the EIS must identify feasible methods to mitigate such impacts.

The DOE's April 8, 2004 Notice of Intent indicates the "EIS would also consider the potential construction and operation of a rail-to-truck inter-modal transfer facility, proposed to be located at the confluence of an existing mainline railroad and a highway".

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The Notice of Intent does not specifically identify the preferred location of such an inter-modal facility. The EIS should identify and evaluate a suite of inter-modal facility alternatives located along the Union Pacific and Burlington Northern/Santa Fe railroads and Interstate 80 in northern Nevada and the Union Pacific mainline and highways in southern Nevada. The analysis of such alternatives should include evaluation of the impacts associated with highway transportation between the inter-modal facilities and the Yucca Mountain site. Because the State of Nevada, Department of Transportation has identified U.S. 93, U.S. 50, U.S. 6, and State Route 318 through White Pine County as an alternative to spent nuclear fuel/high level radioactive waste shipments through the Las Vegas Valley, we believe the EIS should evaluate an alternative wherein the inter-modal facility were located near West Wendover, Nevada.

Regardless of whether DOE develops direct rail access to Yucca Mountain and/or utilizes an inter-modal capability, in excess of 1,700 legal weight truck shipments will still be required. White Pine County believes that Nevada's Governor will designate the U.S. 93, U.S. 50, U.S. 6 routing to avoid the Las Vegas metropolitan area. White Pine County is convinced the impacts of these legal weight shipments must be addressed within the EIS as an action connected to the development and operation of direct rail access and/or inter-modal capabilities.

White Pine County recommends that risk associated with transportation of spent nuclear fuel and other high level radioactive waste can be effectively managed through implementation of appropriate mitigation. Accordingly, the County requests that the EIS include a comprehensive identification and evaluation of feasible methods to mitigate transportation system related risk. Measures which should be addressed within the EIS include training and equipping of emergency first responders and emergency medical personnel; provision of emergency communications equipment; design and implementation of a risk communication program; hazardous cargo routing around the City of Ely; time of day travel restrictions; and siting, development and operation of safe parking areas within the County, among others.

White Pine County believes the EIS should also identify and evaluate potential economic impacts/benefits of transporting SNF/HLW through the County. Examples of local resources available to support the transportation system includes diesel fuel and gasoline; truck parts and tires; food services; and lodging. In addition, the County requests that the EIS consider the economic impacts of locating legal weight truck transportation support facilities within White Pine County including among other possibilities facilities for communications and shipment tracking; vehicle maintenance; driver training; and

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training facilities for DOE/contractor provided security and/or emergency first response personnel.

Sincerely,

151 Paul L. Johnson

Paul Johnson
Chairman

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